

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Zurich American Insurance Company

Plaintiff,

vs.

Asphalt Paving Systems, Inc.

Defendant.

Civil Action No.: 1:22-cv-01535-CPO-MJS

Hon. Christine P. O'Hearn

AGREED RULE 502 ORDER

Pursuant to Rule 502(d) of the Federal Rules of Evidence, the undersigned parties to this action jointly request entry of this Agreed Order, which is intended to prevent attorney-client and work product privilege or protection from being waived by disclosure connected with the captioned litigation.

IT IS HEREBY ORDERED, ON CONSENT OF THE PARTIES:

(i) The production of materials, inadvertent or otherwise, shall not be deemed a waiver of attorney-client privilege or work product protection in this civil action or in any other federal or State proceeding.

(ii) Nothing in (i) above shall limit the right of a party or subpoenaed nonparty to conduct a reasonable review of materials for relevance or otherwise in response to a discovery request or requests.

DATED: _____

Judge

CONSENTED TO BY:

PLAINTIFF	DEFENDANT
<u>/s/ Christopher B. Fontenelli</u> Christopher B. Fontenelli (082532014) LOCKE LORD LLP One Gateway Center Newark, NJ 07102 T: 973-520-2300 cfontenelli@lockelord.com Steven T. Whitmer (<i>pro hac vice</i>) Julie L. Young (<i>pro hac vice</i>) Hannah M. Oswald (<i>pro hac vice</i>) LOCKE LORD LLP 111 South Wacker Drive Chicago, IL 60606 T: 312-443-0254 swhitmer@lockelord.com jyoung@lockelord.com hannah.oswald@lockelord.com <i>Attorneys for Plaintiff Zurich American Insurance Company</i>	<u>/s/ John F. Palladino</u> John F. Palladino (042771989) Colin G. Bell (018552005) HANKIN SANDMAN PALLADINO WEINTROB & BELL, P.C. 30 S. New York Avenue Atlantic City, NJ 08401 T: 609-344-5161 john@hankinsandman.com coling@hankinsandman.com <i>Attorneys for Defendant Asphalt Paving Systems, Inc.</i>